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LYNN M. GALLAGHER
ATTORNEY-AT-LAW

SWIDLER & BERLIN
CHARTERED

DIRECT DIAL
(202)424-7556

December 13, 1993

BY FACSIMILE

Jorge Leon, Esquire
State Water Resources Control Board
Office of the Chief Counsel
901 P Street
Sacramento, CA 95814

Re: Pacific Airmotive Corporation, Burbank Facility

Dear Jorge:

I am pleased to submit on behalf of Pacific Airmotive Corporation (PAC) the enclosed Soil Gas Investigation Workplan for the investigation of PAC's Burbank facility. I believe this workplan meets the requirements set forth in the December 23, 1992 letter from the Regional Board to PAC.

I understand that we have received a 60-day stay of the proceeding before the State Board in order to allow the issues surrounding this soil gas investigation to be resolved. Please call me to discuss this matter after you have had the opportunity to review the workplan. It may useful to have our technical people meet in the near future to resolve any technical issues regarding the workplan.

I look forward to hearing from you.

Sincerely,

Lynn Gallagher

Lynn M. Gallagher

Enclosure

cc: By Facsimile:
Thomas Mintz, U.S. EPA
David Seter, U.S. EPA
Yue Rong, RWQCB
By Regular Mail:
William F. Gross, PAC
Rus Purcell, KJC
Jennifer Soloway, SWQCB

2019804.1

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SOIL GAS INVESTIGATION WORKPLAN
PACIFIC AIRMOTIVE CORPORATION
DECEMBER 1993

INTRODUCTION

This Soil Gas Investigation Workplan has been prepared for Pacific Airmotive Corporation (PAC) located at 2940 North Hollywood Way, Burbank, California (Site). The workplan was originally requested by the Los Angeles Region of the California Regional Water Quality Control Board (RWQCB) in a letter to Mr. Tony Divincenzo of PAC dated 23 December 1992 (Attachment A).

BACKGROUND

Numerous soils investigations have been conducted on the PAC facility under the overview of the RWQCB in the past eight years, and eight groundwater monitoring wells have been installed and sampled for a two year period. Based on the results of recent soil gas investigations conducted at the adjacent Lockheed Building 371 complex, the RWQCB asked PAC to conduct a soil gas survey on their 2940 North Hollywood Way facility to supplement the soil gas data generated on the neighboring Lockheed facility. The request was originally made in a letter from Mr. David A. Bacharowski of the RWQCB to Mr. Tony Divincenzo of PAC, dated 23 December 1992. The following soil gas investigation is based on supplementing the Lockheed soil gas data and concentrates in the northeast corner of the facility where the Lockheed data suggests potential source areas may exist.

SCOPE OF WORK

The following Scope of Work was developed by Kennedy/Jenks Consultants based on the 23 December 1992 letter from the RWQCB. The Soil Gas Investigation will be conducted in accordance with the RWQCB's "Work Plan Requirements for Active Soil Gas Investigation" and "QA/QC and Reporting Requirements for Soil Gas Investigation".

Task 1 - Identify and Mark Sampling Locations

Soil gas sampling locations are dependent on the results of previous soil sample analyses, access limitations and underground utility locations. The proposed soil gas sampling locations are presented on Figure 1. The proposed locations have not been geophysically cleared and therefore may require slight shifts from the proposed map locations to avoid underground utilities and other structures.

Task 2 - Geophysical Screening

To minimize the possibility of striking underground utilities, tanks and pipelines during the Soil Gas investigation, each marked site will be cleared using geophysical survey techniques. If necessary, sampling points will be relocated to avoid subsurface obstructions.

Task 3 - Soil Gas Investigation

A Soil Gas investigation will be performed in the open space between the property boundary and Building No. 2 along the north and east boarders of the PAC facility adjacent to Lockheed property where previous soil gas investigations have been performed. The proposed locations of soil vapor sampling points are presented on Figure 1. The initial sampling point locations are based on approximately 25 foot spacings with 10 foot spacings recommended adjacent to potential source areas identified on the adjacent Lockheed facility (near PAC groundwater monitoring well MW-4 and near the northeast corner of the property). The soil gas samples will be analyzed for volatile organic compounds by EPA Methods 8010/8020. A Contingency Plan is also included to provide additional sampling point locations if deemed necessary based on initial field data.

The soil gas survey will be performed by Transglobal Environmental Geochemistry (TEG). The occurrence of target VOCs in shallow soil gas will be evaluated using a soil gas sampling and analysis methodology developed by TEG. TEG's soil vapor probes are constructed of 5/8 inch outer diameter stainless steel, equipped with a hardened, reverse-threaded steel tip. Nominal lengths are 6 feet although additional lengths may be added. A 1/8 inch diameter polypropylene nylaflow tube runs down the center of the probe to sampling ports beneath the tip.

The probe is driven into the ground by either an electric rotary hammer or with TEG's truck-mounted hydraulic/vibrational system. Once inserted to the desired depth, the probe is rotated 3 to 5 turns in a clockwise direction, which opens the tip and exposes the vapor sampling ports. This design prevents clogging of the sampling ports and cross-contamination from soils during insertion.

Soil vapor is withdrawn from the nylaflow tubing using a syringe connected via an on-off valve. The first 40 cc of gas are discarded to flush the dead volume of the probe and fill it with in-situ soil vapor. The next 20cc of gas are withdrawn in a syringe, plugged, and immediately transferred to the mobile lab for analysis within 8 minutes of collection. Additional soil vapor may be collected and stored in gas-tight containers as desired.

To minimize the potential for cross-contamination between sites, all probe parts are cleaned of excess dirt and moisture prior to insertion. The nylaflow tubing and sampling ports are flushed with hundreds of cc's of ambient air between samples. If water, dirt, or any foreign material is observed in the tubing, the tubing is replaced with fresh tubing.

To eliminate loss of gases during storage, collected gas samples are analyzed immediately (within a maximum of 5 minutes) after collection in TEG's state certified mobile laboratory. One cc of air is injected into a Shimadzu gas chromatograph equipped with megabore capillary columns and with flame ionization, HNU photoionization (10.2 ev lamp), and Hall electrolytic conductivity detectors (Tracor model 1000). These detectors enable on-site analysis for landfill hydrocarbons, petroleum hydrocarbons, volatile aromatics (BTEX), and volatile chlorinated compounds (DCE, TCE, PCE, DCA, TCA, PCA) using EPA approved analytical methodology outlined in methods 8010, 8015 & 8020. Output signals from each detector are processed by HP3393A computing integrators or computer chromatography software and the results entered into a laboratory computer for on-site processing and graphing.

Method blanks are run at the start of each day and throughout the day if high concentrations of volatiles are encountered to ensure no cross-contamination of sampling or analytical equipment between sampling points. Calibration standards including all compounds of concern are run at the beginning of each day and more often if desired. Duplicate samples are analyzed as requested by the client or regulatory agency.

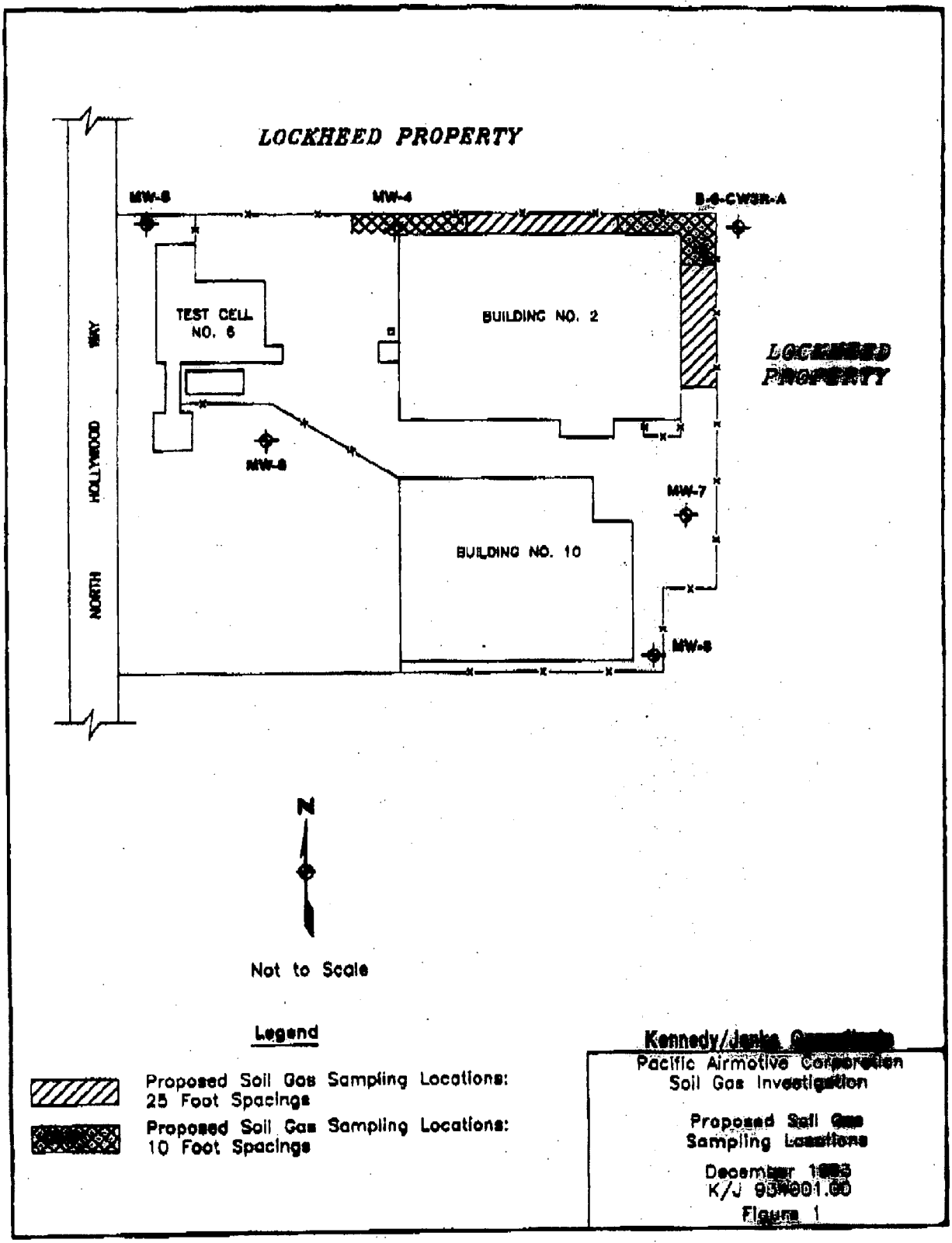
Measured data are entered into a 386/33 MHz multitasking computer, gridded, and viewed on-site using both 2-dimensional (contour) and 3-dimensional (raised relief) projections. The observed results are then used to define the spatial distribution of subsurface contamination to guide the placement of additional sampling locations. Color hardcopy results of these projections are also available in the mobile laboratory.

Task 4 - Contingency Plan

If additional data is necessary to adequately characterize the extent of the chemicals of concern, a Contingency Plan option will be available for additional sampling points at outside locations based on the results of the proposed Soil Gas Investigation (Task 3). PAC will be prepared to add additional sampling points based on the initial Soil Gas Investigation data and evaluation of the data in conjunction with a representative of the RWQCB. To establish a basis for the extent of the Contingency Plan, we propose a maximum of 25 additional soil gas sampling points at depths not to exceed 10 feet bgs, if necessary. If deeper data is deemed necessary by the RWQCB and PAC's representatives, a supplemental investigation will have to be negotiated between PAC, their representatives, and the RWQCB.

Task 5 - Summary Report

The results of the individual tasks performed for the Soil Gas Investigation will be compiled, evaluated and presented in a report. Analytical results will be presented in tabular and graphical form for ease of interpretation. To the extent permitted by the data, conclusions and recommendations will be presented.



STATE OF CALIFORNIA

CALIFORNIA REGIONAL WATER QUALITY CONTROL BOARD—
LOS ANGELES REGION
101 CENTRE PLAZA DRIVE
MONTEREY PARK, CA 91754-2156
(213) 266-7500

December 23, 1992

CERTIFIED MAIL
Return Receipt Requested
Claim No. P 997 018 739

Mr. Tony Divincenzo
Pacific Airmotive Corporation
2940 N. Hollywood Way
Burbank, CA 91505

WELL INVESTIGATION PROGRAM - SOIL GAS INVESTIGATION (FILE NO. 104.0012)

Reference is made to the Lockheed Engineering and Sciences Company (Lockheed) report dated April 24, 1992, prepared by [redacted] consultant, Hargis + Associates, containing results of the soil gas investigation completed at their facilities located at 2940 N. Hollywood Way (Lockheed Building 371 Complex) and 2777 [redacted] Street (Lockheed Building 369), in Burbank, California. [redacted] facilities are located to the north and east of your company's operation.

We understand that Lockheed has provided you with a copy of the report for your use, reference, and evaluation of the investigation work completed. The analytical test results contained in the report identified chlorinated volatile organic compounds (VOCs) in the vapor phase, consisting primarily of tetrachloroethylene (PCE) (ranging from 0.42 to 540 ug/l), trichloroethylene (TCE) (ranging from 0.06 to 38 ug/l), and 1,1,1-trichloroethane (TCA) (ranging from 0.02 to 93 ug/l). Other volatile organics, such as hydrocarbons and ketones were also identified in soil gas. Relatively high concentrations of VOCs in soil gas were identified along the north and east of your company's property lines, and the concentrations increased with depths at one location. Enclosed is a copy of this Regional Board's letter dated September 3, 1992, containing our review and evaluation of the above-mentioned report. As you can see, Lockheed is currently required to conduct further subsurface soil and groundwater investigations at Buildings 371 and 369 areas.

We understand that your company previously owned and operated the property identified as Lockheed Building 371 Complex. Therefore, you should have direct knowledge of historical site operations including chemical usage and potential contaminant sources [redacted].

Based upon the relatively high concentrations of VOCs identified in the areas immediately north and east of your company's property lines, a detailed soil gas investigation at your property at [redacted] North Hollywood Way, Burbank, is required in order to determine the lateral and vertical extent of soil contaminants in vapor phase, delineate the source areas with the most contaminated soils, and provide data for developing an area-wide soil cleanup plan to preclude further migration of contaminants in the subsurface and to protect groundwater resources. You are hereby directed to submit a workplan for conducting a soil gas investigation at your facility. To assist your consultant in developing such a workplan, we have enclosed Work Plan Requirements for Active Soil Gas Investigation and SVOC and Reporting Requirements, and you must follow these guidelines wherever applicable.

The above-mentioned report completed by Lockheed is also available for you to review at this Regional Board office during normal business hours, if needed. We further recommend that you coordinate the soil gas investigation activities with Lockheed in order to have consistent soil gas sampling and analysis procedures, to minimize any future problems associated with data gathering and interpretation, and to reduce the overall cost of the investigation needed.

Four copies of the workplan containing soil gas investigation specified above are due to this Regional Board by February [redacted], 1993. If you have any questions regarding this matter, please contact Mr. Yue Rong at (213) 266-7604.

David A. Bachowski

DAVID A. BACHOWSKI
Environmental Specialist IV

Enclosures

cc: Colette Rostelec - USEPA, Region IX
Jorge Leon - SWRCB, Office of Chief Counsel
Bill Jones - L.A. County, Forester and Fire Warden
Bruce Wojcik - L.A. County, Forester and Fire Warden
Mel Blevins - ULARA Watermaster
Russ Purcell - Kennedy/Jenks Consultants
Ron Helgerson - Lockheed Engineering & Sciences Company

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TELECOPIER/FAX TRANSMITTAL

TODAY'S DATE 12/13/93 *TIME* 5:30 p.m.

TRANSMITTAL TO

INDIVIDUAL Thomas Mintz

COMPANY NAME U.S. EPA

DIRECT PHONE# 415-744-1333

FAX/TELECOPIER# 415-744-1041

TOTAL# OF PAGES 8 *(including cover page)*

TRANSMITTAL FROM

INDIVIDUAL Lynn M. Gallagher

DIRECT PHONE# 202-424-7556

ATTORNEY CODE# 223 *BILLING CODE#* 2992.05

ADDITIONAL MESSAGES (IF any)

IF THERE IS A PROBLEM IN THIS TRANSMISSION, IT IS IMPORTANT THAT YOU NOTIFY:

NAME Fran **PHONE#** 202-424-7645